UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

YENCY ARELLANO, on behalf of himself, FLSA Collective Plaintiffs and the Class.

Plaintiff,

Case No.: 1:20-cv-05293

v.

NOTICE OF MOTION FOR DEFAULT JUDGMENT

GREEN APPLE 37 INC. d/b/a GREEN APPLE, GREEN APPLE GOURMET INC. d/b/a GREEN APPLE, and ERIC YUN KIM,

Defendants.

PLEASE TAKE NOTICE that upon the Affidavit of Anne Seelig, Esq., the Exhibits attached thereto, and upon all prior proceedings had herein, Plaintiff YENCY ARELLANO ("Plaintiff") hereby moves for an Order, pursuant to Fed. R. Civ. P. 55(b)(2), granting Default Judgment in favor of Plaintiff and against Defendants GREEN APPLE 37 INC., GREEN APPLE GOURMET INC., and ERIC YUN KIM, jointly and severally, together with such other relief as the Court deems just and proper.

Pursuant to Local Rule 55.2(b), attached to the Affidavit of Anne Seelig, Esq. are copies of the Clerk's Certificate of Default, Summonses and Complaint, and proposed Default Judgment.

Dated: New York, New York January 13, 2021 LEE LITIGATION GROUP, PLLC

By: /s/ Anne Seelig

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